

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Enemia Gonzalez-Flores, a/k/a Jose Gonzalez Flores

Case No. 25-MJ-1006

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 5, 2025 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

8 U.S.C. §§ 1302(a), 1306(a)

*Offense Description*

Failure to Register as an Alien in the United States

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet./s/ Damon Brown*Complainant's signature*Damon Brown, SDDO*Printed name and title*

Sworn to me telephonically in accordance with Fed. R. Crim. P. 4.1

Date: \_\_\_\_\_

/s/ Craig M. Straw 5-15-2025*Judge's signature*City and state: Philadelphia, PennsylvaniaHonorable Craig M. Straw, U.S. Magistrate Judge*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
v.	:	<b>MAGISTRATE NO. 25-MJ-1006</b>
<b>ENEMIA GONZALEZ-FLORES</b>	:	
<b>a/k/a Jose Gonzalez-Flores</b>		

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

1. I, Damon Brown, am a Supervisory Detention and Deportation Officer (“SDDO”) at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have been a sworn federal law enforcement officer with ICE since April of 2008. As a SDDO, I conduct investigations related to violations of the Immigration and Nationality Act including investigations of foreign-born nationals who have been deported from the United States and subsequently re-enter the United States illegally, as well as foreign-born nationals who commit other immigration violations of Title 8 of the United States Code.

2. I have prepared this affidavit in support of a criminal complaint against Enemia GONZALEZ-Flores, a/k/a “Jose GONZALEZ-Flores (“GONZALEZ”). As set forth more fully below, there is probable cause to believe that GONZALEZ has illegally entered the United States and failed to register as an alien in violation of Title 8, United States Code, Sections 1302(a) and 1306(a). There is probable cause to believe that GONZALEZ is an alien, that is, an individual who is not a citizen or national of the United States; he entered the United States after June 27, 1952; he is fourteen years of age or older; he is not registered and has not applied to register as

an alien pursuant to the Alien Registration Act of 1940; and he has been present in the United States for at least 30 days after entering.

3. This affidavit is based on information I obtained from my personal observations, my training and experience, review of documentary evidence, and information provided to me by other members of the investigation, and other law enforcement personnel. Because this affidavit is submitted only for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, it does not include all information known to the government as a result of the investigation.

#### **PROBABLE CAUSE**

4. On or about September 27, 2022, GONZALEZ was arrested by the United States Border Patrol. ICE records indicate that, at that time, he was processed for a voluntary return to Honduras.

5. Thereafter, on or about March 31, 2025, GONZALEZ was arrested by the Philadelphia Police Department for Robbery, Aggravated Assault, Terroristic Threats, Possessing Instrument of Crime and Recklessly Endangering Another Person.

6. On March 31, 2025, ICE was alerted through a law enforcement database that GONZALEZ was criminally charged by the Philadelphia Police Department.

7. On May 5, 2025, an ICE officer conducted an interview of GONZALEZ at the Curran-Fromhold Correctional Facility in Philadelphia. The ICE officer advised him of his Fifth Amendment rights in the Spanish language and GONZALEZ was provided with an ICE Declaration of Rights Form and Waiver form in Spanish. GONZALEZ waived his right to remain silent and signed the *Miranda* waiver.

8. GONZALEZ stated that he is a 24-year-old citizen of Honduras with no lawful immigration status in the United States, that he entered the United States approximately three years ago on an unknown date by walking across the border without inspection by an immigration officer, that he has no document that permits him to be in the United States, and that he did not register as an alien in the United States.

9. Further investigation of GONZALEZ was conducted in DHS electronic databases and produced no records of alien registration. The electronic records reflect the following information related to GONZALEZ:

a. GONZALEZ is a citizen and national of Honduras, who has never made a lawful entry in the United States.

b. On September 27, 2022, GONZALEZ was discovered unlawfully present in the United States following his arrest by the United States Border Patrol and was processed for Voluntary Return to Honduras.

**CONCLUSION**

10. Based on the foregoing, I believe that there is probable cause to conclude that Enemia GONZALEZ-Flores illegally entered the United States and failed to register as an alien, in violation of Title 8, United States Code, Sections 1302(a) and 1306(a).

/s/ Damon Brown  
Damon Brown  
Supervisory Detention and Deportation Officer  
Immigration and Customs Enforcement

SUBSCRIBED TO AND SWORN TO VIA RELIABLE ELECTRONIC MEANS

/s/ Craig M. Straw 5-15-2025  
The Honorable Craig M. Straw  
United States Magistrate Judge  
Eastern District of Pennsylvania

Dated: